

DEC 18 2018

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JAMES N. HATTEN, Clerk

By: 

UNITED STATES OF AMERICA

v.

MANEUS BISHOP III,
JAMAL BROWN,
TANEISHA CROCKETT,
ZIMALE WADE, AND
TAYLOR HURST

Criminal Indictment

No.

1:18-CR- 499

THE GRAND JURY CHARGES THAT:

Count One

Beginning in or about February 2017 and continuing through in or about October 2017, in the Northern District of Georgia and elsewhere, the defendant, MANEUS BISHOP III, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18 of the United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

Counts Two through Ten

On or about each of the following dates in the chart below, the defendant, MANEUS BISHOP III, knowingly made a false and fictitious written statement to a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, as listed in the chart below, in connection with the acquisition of the corresponding firearms listed in the chart below, which statement was intended

and likely to deceive the licensed dealer of firearms as to a fact material to the lawfulness of the acquisition of said firearms by MANEUS BISHOP III under Chapter 44, Title 18, United States Code, in that MANEUS BISHOP III falsely represented that he was the actual buyer of said firearms and was not purchasing the firearms on behalf of another person, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

Count	Date	Licensed Firearms Dealer	Firearms Acquired by Defendant
2	July 12, 2017	Union City Pawn & Jewelry	Two Glock, model 22, .40 caliber pistols; one Smith & Wesson, model MP45, .45 caliber pistol
3	July 26, 2017	Ott Gun Works	Ten Taurus, model PT111, 9mm pistols
4	August 2, 2017	Peachtree City Pawn & Jewelry	Two Glock, model 22, .40 caliber pistols; one Taurus, model PT111, 9mm pistol
5	August 14, 2017	Union City Pawn & Jewelry	Two Taurus, model PT111, 9mm pistols
6	August 14, 2017	Fourth Armory	Five Glock, model 22, .40 caliber pistols

7	August 24, 2017	Union City Pawn & Jewelry	Three Glock, model 22, .40 caliber pistols
8	August 30, 2017	Bucks Pawn Shop	Two Glock, model 37, .45 caliber pistols; and four Taurus, model PT111, 9mm pistols
9	September 2, 2017	Union City Pawn & Jewelry	Three Taurus, model PT111, 9mm pistols
10	September 8, 2017	Newnan Plaza Shop	Three Taurus, model PT111, 9mm pistols

Counts Eleven through Fourteen

On or about each of the following dates in the chart below, the defendants, MANEUS BISHOP III and TANEISHA CROCKETT, aided and abetted by each other, did knowingly make a false and fictitious written statement to a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, as listed in the chart below, in connection with the acquisition of the corresponding firearms listed in the chart below, which statement was intended and likely to deceive the licensed dealer of firearms as to a fact material to the lawfulness of the acquisition of said firearms by TANEISHA CROCKETT under Chapter 44, Title 18, United States Code, in that TANEISHA CROCKETT falsely represented that she was the actual buyer of said firearms and was not purchasing the firearms on behalf of another person, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2), and Section 2.

Count	Date	Licensed Firearms Dealer	Firearms Acquired by Defendant
11	October 2, 2017	Elite Pawn & Jewelry	Five Taurus, model PT111, 9mm pistols
12	October 3, 2017	Slither Missions	Three Glock, model 37, .45 caliber pistols
13	October 3, 2017	Newnan Plaza Shop	Five Taurus, model PT111, 9mm pistols
14	October 6, 2017	BDP Management	One Glock, model 30, .45 caliber pistol

Counts Fifteen and Sixteen

On or about each of the following dates in the chart below, the defendants, MANEUS BISHOP III and TAYLOR HURST, aided and abetted by each other, did knowingly make a false and fictitious written statement to a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, as listed in the chart below, in connection with the acquisition of the corresponding firearms listed in the chart below, which statement was intended and likely to deceive the licensed dealer of firearms as to a fact material to the lawfulness of the acquisition of said firearms by TAYLOR HURST under Chapter 44, Title 18, United States Code, in that TAYLOR HURST falsely represented that she was the actual buyer of said firearms and was not purchasing the firearms on behalf of another person, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2), and Section 2.

Count	Date	Licensed Firearms Dealer	Firearms Acquired by Defendant
15	October 17, 2017	BDP Management	Two Hi-Point, model JCP, .40 caliber pistols; three Taurus, model PT111, 9mm pistols
16	October 17, 2017	Buck Pawnbroker	Five Taurus, model PT111, 9mm pistols

Count Seventeen

On or about October 20, 2017, in the Northern District of Georgia, the defendants, MANEUS BISHOP III and JAMAL BROWN, aided and abetted by each other, did knowingly make a false and fictitious written statement to BDP Management, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, in connection with the acquisition of six Glock, model 22, .40 caliber pistols, which statement was intended and likely to deceive BDP Management as to a fact material to the lawfulness of the acquisition of said firearms by JAMAL BROWN under Chapter 44, Title 18, United States Code, in that JAMAL BROWN falsely represented that he was the actual buyer of said firearms and was not purchasing the firearms on behalf of another person, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2), and Section 2.

Count Eighteen

On or about October 17, 2017, in the Northern District of Georgia, the defendants, MANEUS BISHOP III and ZIMALE WADE, aided and abetted by each other, did knowingly make a false and fictitious written statement to City Pawn of Bremen, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, in connection with the acquisition of five Taurus, model PT111, 9mm pistols, which statement was intended and likely to deceive City Pawn of Bremen as to a fact material to the lawfulness of the acquisition of said firearms by ZIMALE WADE under Chapter 44, Title 18, United States Code, in that ZIMALE WADE falsely represented that he was the actual buyer of said firearms and was not purchasing the firearms on behalf of another person, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2), and Section 2.

Forfeiture Provision

Upon conviction of any of the offenses alleged in Counts One through Eighteen of this Indictment, the defendant, MANEUS BISHOP III, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense.

Upon conviction of any of the offenses alleged in Counts Eleven through Fourteen of this Indictment, the defendant, TANEISHA CROCKETT, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and

Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense.

Upon conviction of any of the offenses alleged in Counts Fifteen through Sixteen of this Indictment, the defendant, TAYLOR HURST, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense.

Upon conviction of the offense alleged in Count Seventeen of this Indictment, the defendant, JAMAL BROWN, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense.

Upon conviction of the offense alleged in Count Eighteen of this Indictment, the defendant, ZIMALE WADE, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense.

If, as a result of any act or omission of the defendant(s), any property subject to forfeiture:

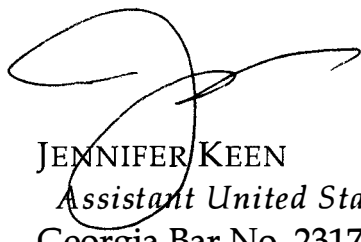
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without undue complexity or difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant(s) up to the value of the above forfeitable property.

A True Bill BILL
ANNORATE
FOREPERSON

BYUNG J. PAK
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